

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

Case No. 2:23-cv-00449-JRG

v.

LENOVO GROUP LIMITED,

Defendant.

DECLARATION OF ADRIAN CHIM

I, Adrian Chim, declare as follows:

1. I am an employee of Lenovo Hong Kong Services Limited and my title is Director, Group Financial Reporting and Accounting Policy. I have held that position since June 2015. I submit this declaration based on my knowledge of the facts set forth herein and my investigation of the relevant corporate records and, if called upon as a witness, I could and would competently testify as to the truth of each statement below.

2. LGL is a company incorporated in Hong Kong with its principal place of business in Hong Kong at the address Lincoln House, 23rd Floor, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong.

3. LGL is and has been a holding company, which serves as a direct and indirect parent company for its subsidiaries. As a holding company, LGL does not itself manufacture, sell, offer for sale, export, import, or otherwise distribute any Lenovo-branded products. Nor has LGL itself distributed any Lenovo-branded products through established distribution channels.

4. LGL itself does not operate in the United States, make products for the United States market, or offer services to customers in the United States. LGL is not authorized, registered, or licensed to do business in Texas or anywhere else in the United States and has no place of business, sales, or presence in Texas or anywhere else in the United States. LGL has no bank accounts, real property, personal property, telephone listing, or any other assets in Texas or anywhere else in the United States. LGL does not store or maintain documents in Texas. And LGL has no employees in Texas or anywhere else in the United States. Nor has LGL ever engaged in end-user support in Texas.

5. LGL does not itself engage in any sales, advertising, or marketing efforts targeting Texas or anywhere else in the United States. LGL does not itself sell or offer to sell any Lenovo-branded products or services on the Lenovo.com website.

6. Lenovo (United States) Inc. ("Lenovo US") is the entity responsible for selling Lenovo-branded products in the United States. Lenovo US purchases those products from another LGL subsidiary, Lenovo PC HK Limited, and then imports them into the United States for sale. Lenovo US is a Delaware corporation and maintains its principal place of business in Morrisville, North Carolina. Lenovo PC HK Limited is a Chinese company having its principal place of business in Hong Kong.

7. LGL is not involved in the daily business activities and decisions of Lenovo US pertaining to the use, sale, offer for sale, marketing, distribution, or importation of Lenovo-branded products in the United States, and Lenovo US does not need the approval of LGL with respect to those business activities. Furthermore, LGL has not entered into any distribution, sales, or marketing agreements with Lenovo US or any other United States affiliate related to Lenovo-branded products. LGL is also not involved in any manufacturing, sales, advertising, or marketing activities for Lenovo US.

8. Similarly, Lenovo US does not need the approval of Lenovo PC HK with

respect to the daily business activities and decisions pertaining to the use, sale, offer for sale, marketing, distribution, or importation of Lenovo-branded products in the United States.

9. LGL did not and does not conduct any research and development with respect to Lenovo-branded products. Nor has LGL licensed any such products to Lenovo US.

10. LGL also does not pay or reimburse for any expenses incurred by Lenovo US. LGL does not pay any wages or salaries to employees of Lenovo US.

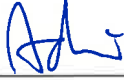
11. There are no common officers or directors between LGL on the one hand and Lenovo US on the other. The officers and directors of LGL are listed in the document attached to this declaration as Exhibit A. The officers and directors of Lenovo US are listed in the document attached to this declaration as Exhibit B. There are also no common officers or directors between Lenovo PC HK Limited on the one hand and Lenovo US on the other. The officers and directors of Lenovo PC HK Limited are listed in the document attached to this declaration as Exhibit C.

12. LGL files separate tax returns from Lenovo US. LGL files its tax returns in Hong Kong. It is my understanding that Lenovo US files its tax returns in the United States.

13. LGL has no role in any of the property owned by Lenovo US in the United States. LGL employees do not work out of or utilize any of Lenovo US's properties in the United States.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Hong Kong on this 16th day of May, 2024.

A handwritten signature in blue ink, appearing to be 'Adrian', is written above a horizontal line.

Adrian Chim